

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: JOANN INC., ¹ Post-Effective Date Debtor.)))))))	Chapter 11 Case No. 25-10068 (CTG)
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**CONSENT ORDER APPROVING JOINT STIPULATION REGARDING
CLAIMS OF ALTO CONYERS PLAZA, LP**

Pursuant to and in accordance with the *Joint Stipulation Regarding Claims of ALTO Conyers Plaza, LP* (the “Stipulation”)² attached hereto as **Exhibit 1**, and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief set forth herein is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and with the consent of the Parties; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

¹ The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

1. The Stipulation is hereby approved and the terms of the Stipulation are hereby made effective by this Consent Order.

2. Sufficient notice of this Consent Order has been provided and the requirements of Rule 3007 of the Federal Rules of Bankruptcy Procedure and any applicable local rules of this Court are otherwise satisfied.

3. Notwithstanding any applicable rules to the contrary, this Consent Order shall be immediately binding and enforceable upon its entry.

4. The Debtors and the Plan Administrator are authorized to take all actions necessary to effectuate the relief granted in this Consent Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Consent Order.

Exhibit 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC.,¹

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**JOINT STIPULATION REGARDING
CLAIMS OF ALTO CONYERS PLAZA, LP**

Ann Aber, the Plan Administrator, for and on behalf of the Debtors (collectively, “Debtors”), and ALTO Conyers Plaza LP (“Landlord” and together with the Debtors, collectively, the “Parties”), by and through their undersigned counsel, hereby enter into this stipulation (this “Stipulation”) as to the following:

1. The Landlord’s lease was rejected effective April 30, 2025.
2. On or about March 25, 2025, the Landlord filed a Proof of Claim designated as Claim No. 7610.
3. On or about April 2, 2025, the Landlord filed a Proof of Claim designed as Claim No. 9346, which amended Claim No. 7610.
4. On or about April 2, 2025, Landlord filed a Proof of Claim designated as Claim No. 10673, which amends Claim No. 9346. Claim No. 10673 asserts claims totaling \$701,870.04, including administrative expense claims totaling \$19,398.19.
5. The administrative rent claim portion of Claim No. 10673 has been paid.

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6. Plan Administrator and Landlord hereby agree to resolve the administrative claims set forth in Claim No. 10673 by the allowance and payment of \$19,398.19 as an administrative expense claim, and further agree that upon the filing of this Certification the administrative expense claims set forth in Claim No. 10673 shall be deemed withdrawn with prejudice.

7. For the avoidance of doubt, the general unsecured portion of Claim No. 10673 shall remain on the Claims Register, subject to the GUC Trust's further objection on any substantive or non-substantive grounds.

8. This Stipulation resolves *Plan Administrator's Eighteenth (Non-Substantive) Omnibus Objection to Certain Superseded Claims* [Docket No. 1879] (the "Superseded Objection") solely as to Claim Nos. 7610, 9346, and the administrative portion of Claim No. 10673. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order in respect of the Superseded Objection that is consistent with this Stipulation.

9. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord.

STIPULATED and AGREED this 9th day of January, 2026:

[Signature Page Follows]

Dated: January 9, 2026
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

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